Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	**)**	
	)	
Amendment of Section 97.201(b) of the	**)**	**RM - 10313**
Commission™s Rules Regarding Auxiliary	**)**	
Operation in the Amateur Service	**)**	

To: Chief, Public Safety and Wireless Division,
Wireless Telecommunications Bureau

From: Jim Bradshaw, AC6TK, Owner and operator of a TS2000 Transceiver.
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Comments RE: Auxiliary operations in general and specifically Sky Command II

Acknowledging that Kenwood intends that the FCC allow auxiliary operation on the 2m frequencies specified in their petition, it appears that the current capabilities of Sky Command II as advertised would also require the suspension of Amateur Radio station identification requirements, as no provision is made for automatic identification of the remotely controlled station. This is the same drawback that we see with many "crossband repeater" functions included in dual-band VHF/UHF mobile transceivers from various manufacturers. The lack of ability for licensed Amateur Radio operators to identify their stations, and the potential for on-frequency noise from the main band receiver to be retransmitted without concern for interference to operations already in progress, constitutes poor amateur practice on both counts.

Most Amateurs have regarded these features as "attractive nuisances" after some limited testing, or may find these features to be adaptable to some degree of legal operation although usually not to the degree advertised by the various manufacturers. It is, after all, the responsibility of the licensed amateur to determine the proper operation of the station under his or her control. It is apparent that Kenwood and perhaps other manufacturers may not appreciate FCC rules for the Amateur Radio Service, nor do they seem to understand all of the operational conventions of U.S. amateurs, but I do thank them for their innovative and quality products. It seems to me that the failure of Sky Command, lies in the inability of the sub-band unit to operate full-duplex on frequencies where auxiliary operation is currently allowed, and a lack of provision for automatic identification. Perhaps Kenwood could have provided rear panel inputs and outputs in order for the amateur to devise his/her own auxiliary or wireline link to the TS2000.

On the question of the petition to allow auxiliary link operation in the 2 meter band, if it were indeed to be allowed, I would ask that it be restricted to the same frequencies where automatic repeater outputs are currently allowed, in order to protect the numerous weak signal and simplex operations in the band from un-monitored transmissions.

The observations of some amateurs that the 2 meter band is not being utilized fully, is both ridiculous and doesn't excuse a disregard for potential interference to communications in progress. In my opinion based on my experience as both Communications Tech and Amateur Radio operator for more than 20 years, I find that usage of Amateur bands and Commercial bands to a great extent follow each other with both the population density and terrain characteristics of any given area resulting in comparable usage of both. For all of those 20 years, I have resided, operated and worked in densely and sparsely populated areas with numerous high altitude radio sites and ground stations on flat expanses. It is obvious to me that the 2 meter band is fully utilized and even overcrowded to the point of discouragement wherever VHF PLMR services are also crowded.

Thank You,

Jim Bradshaw